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September 29, 2006

BY UPS OVERNIGHT DELIVERY

Lewis Mitani (SFD-8-3)  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Mayer, Brown, Rowe & Maw LLP  
1909 K Street, N.W.  
Washington, D.C. 20006-1101

Main Tel (202) 263-3000  
Main Fax (202) 263-3300  
www.mayerbrownrowe.com

**John S. Hahn**  
Direct Tel (202) 263-3346  
Direct Fax (202) 263-5346  
jhahn@mayerbrownrowe.com

Re: Request for Information dated May 11, 2006;  
Oahu Sugar Company on Waipio Peninsula  
Portion of the Pearl Harbor Naval Complex  
Superfund Site

Dear Mr. Mitani:

I am responding on behalf of Kaanapali Land LLC ("Kaanapali") to the Information Request addressed to Mr. Gailen Hull dated May 11, 2006. This letter, along with Exhibits A and B and the enclosed documents, constitute the response of Kaanapali. Thank you for accomodating us with respect to the schedule for responding.

As you know, the Information Request focused on Oahu Sugar's operations on Waipio Peninsula from 1947 to 1994. Kaanapali was not formed until 2002, and then for purposes of the bankruptcy reorganization of Amfac Hawaii, LLC and various affiliates. Kaanapali currently has no employees and never owned or conducted any operations at the Site. For these reasons, there are no Kaanapali personnel with personal knowledge of the operations conducted on the Peninsula and no responsive records in the files of Kaanapali.

In order to respond, Kaanapali searched for and has attempted to assemble relevant publicly available records, and is producing a number of such records with this response. The publicly available records discuss apparent aspects of the operations conducted by Oahu Sugar pursuant to its leases from the Navy, and also provide relevant information on the Navy's extensive military activities on the Peninsula and at the Site during and after World War II.

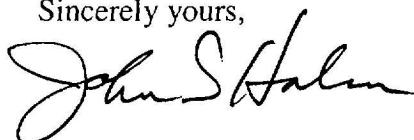
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After you have had an opportunity to review this response, I would welcome the opportunity to discuss any questions you may have. I note that Mr. Bradfish was particularly interested in understanding the insurance coverage for Oahu Sugar Company, LLC when we spoke by phone last month, and I would be pleased to discuss with him our ongoing efforts to locate insurance policies and secondary evidence of coverage. I look forward to speaking with both of you.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John S. Hahn". The signature is fluid and cursive, with the first name "John" and last name "Hahn" clearly distinguishable.

John S. Hahn

Attachments

## EXHIBIT A

### KAANAPALI LAND, LLC'S FURTHER RESPONSE TO REQUEST FOR INFORMATION PEARL HARBOR NAVAL COMPLEX SUPERFUND SITE

Pursuant to § 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9601, *et seq.*, Kaanapali Land, LLC ("Kaanapali") respectfully submits the following further responses to the Request for Information it received from the United States Environmental Protection Agency ("EPA") via letter dated May 11, 2006. These responses are made subject to and without waiving the Objections stated in Exhibit B.

#### RESPONSES TO SPECIFIC QUESTIONS

1. Please provide all documents concerning the identity (e.g. common, chemical and/or trade name) and quantities of all chemicals stored, used, or mixed at the Site from 1947 through 1994.

**Response:** Kaanapali states that it is presently unaware of any Kaanapali documents responsive to this request, for the reasons set forth in the accompanying letter. Answering further, over the period in question, Kaanapali is informed and believes that chemicals, including fertilizers and herbicides, consistent with the operations of a sugar plantation on the Peninsula, were stored and mixed at the Site. This conclusion is supported by the materials in the possession of EPA and publicly available materials discovered by Kaanapali in the process of responding to the request; however, Kaanapali does not necessarily subscribe to various of the statements and allegations contained therein because Kaanapali cannot presently verify their accuracy. For background on the various chemicals that may have been used, see *Weed Control Manual for the Hawaiian Sugar Industry* dated January 1962 compiled by the Weed Control Research Department, Experiment Station – Hawaiian Sugar Planters Association, which